



## Notice of Service of Process

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Transmittal Number: 23915680  
Date Processed: 10/14/2021

**Primary Contact:** Walgreens Distribution  
Corporation Service Company- Wilmington, DELAWARE  
251 Little Falls Dr  
Wilmington, DE 19808-1674

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<b>Entity:</b>	Walgreen Co. Entity ID Number 0501431
<b>Entity Served:</b>	Walgreen Co.
<b>Title of Action:</b>	Luz Maria Ortega Diaz vs. Walgreens Corporation
<b>Matter Name/ID:</b>	Luz Maria Ortega Diaz vs. Walgreens Corporation (11644709)
<b>Document(s) Type:</b>	Summons/Complaint
<b>Nature of Action:</b>	Personal Injury
<b>Court/Agency:</b>	Hennepin County District Court, MN
<b>Case/Reference No:</b>	200014-001
<b>Jurisdiction Served:</b>	Minnesota
<b>Date Served on CSC:</b>	10/13/2021
<b>Answer or Appearance Due:</b>	20 Days
<b>Originally Served On:</b>	CSC
<b>How Served:</b>	Certified Mail
<b>Sender Information:</b>	Gary L. Manka 612-333-1671

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Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

**To avoid potential delay, please do not send your response to CSC**

251 Little Falls Drive, Wilmington, Delaware 19808-1674 (888) 690-2882 | [sop@cscglobal.com](mailto:sop@cscglobal.com)

<b>EXHIBIT</b> <b>A</b>
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STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT  
CASE TYPE: PERSONAL INJURY

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Luz Maria Ortega Diaz,

Plaintiff,

Court File No. \_\_\_\_\_

vs.

**SUMMONS**

Walgreens Corporation, a  
foreign corporation conducting  
business in the State of Minnesota,

Defendant.

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THE STATE OF MINNESOTA TO THE ABOVE-NAMED DEFENDANT:

1. **YOU ARE BEING SUED.** The Plaintiff has started a lawsuit against you. The Plaintiff's Complaint against you is attached to this Summons. Do not throw these papers away. They are official papers that affect your rights. You must respond to this lawsuit even though it may not yet be filed with the Court and there may be no Court file number on this Summons.

2. **YOU MUST REPLY WITHIN 20 DAYS TO PROTECT YOUR RIGHTS.** You must give or mail to the person who signed this Summons a **written response** called an Answer within 20 days of the date on which you received this Summons. You must send a copy of your Answer to the person who signed this Summons located at Katz & Manka, Ltd., 13911 Ridgedale Drive, Suite 330, Minnetonka, MN 55305.

3. **YOU MUST RESPOND TO EACH CLAIM.** The Answer is your written response to the Plaintiff's Complaint. In your Answer you must state whether you agree or disagree with each paragraph of the Complaint. If you believe the Plaintiff should not be given everything asked for in the Complaint, you must say so in your Answer.

4. **YOU WILL LOSE YOUR CASE IF YOU DO NOT SEND A WRITTEN RESPONSE TO THE COMPLAINT TO THE PERSON WHO SIGNED THIS SUMMONS.** If you do not answer within 20 days, you will lose this case, you will not get to tell your side of the story, and the Court may decide against you and award the Plaintiff everything asked for in the Complaint. If you do not want to contest the claims stated in the Complaint, you do not need to respond. A Default Judgment can then be entered against you for the relief requested in the Complaint.

5. **LEGAL ASSISTANCE.** You may wish to get legal help from a lawyer. If you do not have a lawyer, the Court Administrator may have information about places where you can get legal assistance. **Even if you cannot get legal help, you must still provide a written Answer to protect your rights, or you may lose the case.**

6. **ALTERNATIVE DISPUTE RESOLUTION.** The parties may agree to or be ordered to participate in an alternative dispute resolution process under Rule 114 of the Minnesota General Rules of Practice. You must still send your written response to the Complaint even if you expect to use alternative means of resolving this dispute.

Dated: 10/07/2021

KATZ & MANKA, LTD.

By: 

Gary L. Manka, #67180

Attorneys for Plaintiff

13911 Ridgedale Drive, Suite 330

Minnetonka, MN 55305

Telephone: 612-333-1671

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

CASE TYPE: Personal Injury  
COURT FILE NO.: \_\_\_\_\_

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Luz Maria Ortega Diaz,

Plaintiff,

vs.

**COMPLAINT**

Walgreens Corporation, a  
foreign corporation conducting  
business in the State of Minnesota,

Defendant.

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Plaintiff, Luz Maria Ortega Diaz, for her cause of action against the above-entitled  
Defendant, states and alleges as follows:

I.

That at all times material herein, the plaintiff, Luz Maria Ortega Diaz, has been a resident  
of the State of Minnesota, County of Hennepin.

II.

That the defendant, Walgreens Co., is a foreign corporation, with its principal place of  
business located in the State of Illinois but also doing business in the State of Minnesota as well  
as other states throughout the country.

III.

That on October 20, 2020, Defendant owned and operated a certain drugstore, known as

Walgreens, located at 151 North State Street, in the City of Chicago, State of Illinois, in addition to multiple facilities located throughout the State of Minnesota.

IV.

That on said date, the plaintiff herein was lawfully on said premises as a customer when she fell on water that had accumulated, apparently as a result of a faulty cleaning machine being utilized by an employee, subcontractor, agent, or other designee of the defendant herein.

V.

That the said water had accumulated as a direct and proximate result of Defendant's negligent failure to maintain, inspect, and repair its premises, and to warn Plaintiff of the unreasonable risk of harm caused by conditions and/or activities on the premises at that said time.

VI.

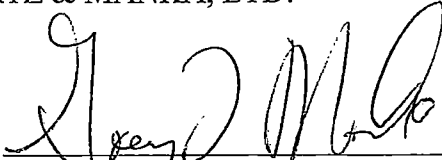
That as a direct and proximate result of the negligence and carelessness of Defendant, through their employee, agent, subcontractor, or other designee, Plaintiff has suffered severe and painful injuries, many of which are permanent in nature.

VII.

That as a further direct and proximate result of the negligence and carelessness of Defendant, Plaintiff has in the past and will in the future incur hospital and medical expenses for treatment and care of the various injuries she suffered, loss of earnings, and an impairment of her future earning capacity, physical pain, suffering, and mental distress, embarrassment, and loss of the enjoyment of life, with said total damages being in excess of \$50,000.00

WHEREFORE, Plaintiff prays for judgment against the Defendant herein in an amount in excess of Fifty Thousand (\$50,000.00) Dollars, together with her interest, costs, and disbursements incurred herein.

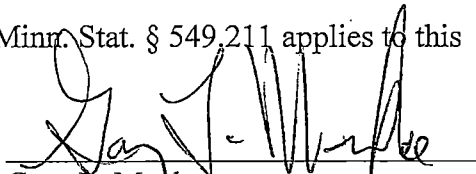
KATZ & MANKA, LTD.

By   
Gary L. Manka #67180  
Attorneys for Plaintiff  
13911 Ridgedale Drive, Suite 330  
Minnetonka, MN 55305  
Telephone: 612-333-1671

DATED: 10/07/2021

ACKNOWLEDGMENT

The undersigned hereby acknowledges that Minn. Stat. § 549.211 applies to this pleading.

  
Gary L. Manka